

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

TELEBRANDS CORPORATION,)	
)	
Plaintiff,)	CASE NO. 1:23-cv-00631-BMB
)	
v.)	Judge Bridget Meehan Brennan
)	
WINSTON PRODUCTS LLC,)	<u>DEFENDANT WINSTON PRODUCTS</u>
)	<u>LLC’S UNOPPOSED MOTION FOR AN</u>
Defendant.)	<u>EXTENSION ON A DEADLINE TO</u>
)	<u>ANSWER, MOVE OR OTHERWISE</u>
)	<u>RESPOND TO PLAINTIFF’S</u>
)	<u>COMPLAINT</u>

Defendant Winston Products LLC (“Winston”), by and through their counsel, moves this Court for an Order granting an extension of thirty days—from April 18, 2023 until **May 18, 2023** to answer, move, or otherwise respond to Plaintiff’s Complaint. ECF No. 1. Defendant has informed Plaintiff of their request, and were informed that Plaintiff would not oppose the request for an extension.

Defendant has not previously requested an extension of time to respond to Plaintiff’s complaint. This requested is submitted in good faith and not for purposes of delay. As a result, good cause exists for granting the extension and no prejudice will result to either party by the granting of this motion.

For those reasons, Defendant seeks an additional **thirty days** (until **May 18, 2023**) to answer, move, or otherwise respond to Plaintiff’s Complaint.

DATED: April 14, 2023

Respectfully submitted,

s/David A. Bernstein

Nicholas Clifford (*Pro Hac Vice to be filed*)

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Attorneys for Defendant, Winston Products LLC

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2023, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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